

Mike Whannell
200 Unit E
Warrensburg, Mo 64093

U.S. Department of Transportation
Federal Aviation Administration
DOT Docket Web Site
<http://dms.dot.gov>

Re: Docket Number FAA-2004-17681, Fuel Tank Safety Compliance Extension (Final Rule) and Aging Airplane Program Update (Request for Comments); Final Rule

To Whom It May Concern:

I sincerely appreciate this opportunity to submit comments on the Federal Aviation Administration's Final Rule for Fuel Tank Safety Compliance and Aging Airplane Program Update. I am currently attending Central Missouri State University completing my bachelors of science in aviation management, and will begin work towards my masters degree in aviation safety this spring.

First and foremost, I am in complete support both programs being proposed by the administration, the Aging Airplane Program Update and Fuel Tank Safety Compliance Extension. These reviews are important to not only the safety of passengers internationally, but to the continued success of the airline industry. In a current time when the prolonged status of the airline industry is unclear, and the successes of previous decades have begun to fall under shadows of bankruptcy and collapse, such an importance on safety and compliance could not be more important. Consumers in today's market have been saturated by over dramatized media images of airline crashes and incidents, thus further weakening trust in our nation's most reliable mode of

transportation, airlines. With the FAA's comprehensive review of the Aging Airplane Program, the consumer trust in a reliable means of transport will hopefully be rebuilt.

The FAA states three outstanding goals in the review of this program and extension which, in turn, are anticipated in producing three positive results: (1) Enhancing safety by causing inspections to be focused on the same area of an airplane at the same time and by reducing the need to disturb airplane systems repeatedly; (2) Fewer service disruptions by reducing the number of times an airplane has to be removed from service to perform such inspections; and (3) Significantly lower compliance costs for operators due to the efficiencies associated with performing multiple inspections at the same time. I feel that there couldn't be a better solution benefiting both airline maintenance managers, and those at the FAA ensuring "the highest-degree-of-care" to all passengers. My only concern on the topic is that FAA has not publicized its efforts to review these policies towards the general public enough as they can. Large efforts such as this must be widely published so that our nation can visibly see that our policy-makers are working with both sides for a much larger and ultimately more beneficial cause, safety.

In conjunction with the Aging Airplane Program Update, the Fuel Tank Safety Compliance Extension of the operational compliance date from December 6, 2004, to December 16, 2008 is most definitely necessary. First, SFAR88 requires design approval holders to perform complex analyses and to develop programs from those analyses, and according the proposal the design approval holders have not yet fully developed these tasks. Thus, operators cannot develop their maintenance and inspection instructions without this guidance and information from the design approval holders. Secondly, there

were further problems with SFAR 88 on the specificity of safety assessments and their inability to assist with the development of maintenance programs. Lastly, there was confusion and a lack of a common understanding between the FAA, the design approval holders and operators. With all of these contributing factors it seems highly unreasonable that the date of December 6, 2004 would ever have been a practical deadline. The aforementioned goals would never be attainable on such a stringent deadline.

I feel that it was entirely appropriate to combine these two proposals and understand the success of each somewhat depends on the success of the other. With these two proposals working to smooth the alignment of the Fuel Tank Safety Rule with the same goal of the Aging Airplane Program each will be a success. In matters as important as these I would remind the Administration that haste in such a situation would produce results contradictory of those sought. Extending these dates will foster a care and attention to detail that might be lost under a short, stringent timeline. In response to the implementation of these safety measures as soon as possible, I would agree that they need to be employed as soon as practical, not necessarily as soon as possible.

Once again, I appreciate the opportunity to provide comments on the Fuel Tank Safety Compliance and Aging Airplane Program Update. These proposals represent a significant venture for the FAA and its continued cooperation with the airline industry it serves. I don't feel that the public and perhaps the industry have a clear enough understanding of the issues the FAA is attempting to address through these proposals, and thus the Administration should work on educating all parties involved on the importance of such proposals. Safety is the primary concern in everything we accomplish, and I

commend the FAA on their continued efforts to make aviation one of the safest modes of transportation worldwide.

Sincerely,

Mike Whannell
Central Missouri State University